

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

**DANIEL CONCEPCION, Individually and  
on Behalf of All Those Similarly Situated**

Plaintiffs

v.

**OFFICE OF THE COMMISSIONER OF  
BASEBALL, et als**

Defendants

**CIVIL NO. 3:22-cv-01017-ADC**

**RE: CLASS ACTION COMPLAINT FOR  
VIOLATIONS OF ANTI-TRUST LAWS;  
VIOLATIONS OF FEDERAL AND  
PUERTO RICO WAGE AND HOUR  
LAWS; DECLARATORY RELIEF;  
VIOLATION OF CONSTITUTIONAL  
RIGHT TO EQUAL PROTECTION**

**JURY TRIAL DEMANDED**

**PLAINTIFFS' MOTION ATTACHING THIRTY-SIX DEFENDANTS' EXECUTED  
WAIVERS OF SERVICE AND REQUESTING A BRIEF EXTENSION OF TIME  
TO SERVE TWO OTHER DEFENDANTS**

COME NOW plaintiff, David Conception, individually and on behalf of all those similarly situated, through the undersigned legal representation and STATE and PRAY:

Attached as Exhibit 1 to this motion are the executed waivers of service of summons of all defendants of this case except for the Baltimore Orioles, Inc. and the Baltimore Orioles, L.P. which counsel did not agree to waive the service of summons.

ITEM NO.	DEFENDANT NAME
1.	OFFICE OF THE COMMISSIONER OF BASEBALL
2.	ROB MANFRED
3.	KANSAS CITY ROYALS BASEBALL CORP.
4.	MIAMI MARLINS, L.P.
5.	SAN FRANCISCO BASEBALL ASSOCIATES LLC
6.	BOSTON REDSOX BASEBALL CLUB L.P.

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ITEM NO.	DEFENDANT NAME
7.	ANGELS BASEBALL LP
8.	CHICAGO WHITE SOX LTD
9.	ST. LOUIS CARDINALS, LLC
10.	COLORADO ROCKIES BASEBALL CLUB, LTD
11.	BASEBALL CLUB OF SEATTLE, LLP
12.	THE CINCINNATI REDS, LLC
13.	HOUSTON BASEBALL PARTNERS LLC
14.	ATHLETICS INVESTMENT GROUP, LLC
15.	ROGERS BLUE JAYS BASEBALL PARTNERSHIP
16.	CLEVELAND INDIANS BASEBALL CO., L.P.
17.	CLEVELAND INDIANS BASEBALL CO., INC.
18.	PADRES L.P.
19.	SAN DIEGO PADRES BASEBALL CLUB, L.P.
20.	MINNESOTA TWINS, LLC
21.	WASHINGTON NATIONALS BASEBALL CLUB, LLC
22.	DETROIT TIGERS, INC.
23.	LOS ANGELES DODGERS, LLC
24.	LOS ANGELES DODGERS HOLDING CO. LLC
25.	STERLING METS L.P.
26.	ATLANTA NATIONAL LEAGUE BASEBALL CLUB, INC.
27.	AZPB L.P.

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ITEM NO.	DEFENDANT NAME
28.	THE PHILLIES L.P.
29.	PITTSBURG ASSOCIATES, LP
30.	NEW YORK YANKEES P'ship
31.	TAMPA BAY RAYS BASEBALL Ltd.
32.	RANGERS BASEBALL EXPRESS, LLC
33.	RANGERS BASEBALL, LLC
34.	CHICAGO CUBS BASEBALL CLUB, LLC
35.	MILWAUKEE BREWERS BASEBALL CLUB, INC.
36.	MILWAUKEE BREWERS BASEBALL CLUB, L.P.

The appearing parties respectfully request this Honorable Court for a brief 30-day extension of time, ending on May 11, 2022, to serve the summons of said two defendants. This extension of time is not requested with the intention of delaying this case proceeding, and is sought in good faith.

**WHEREFORE**, the appearing parties request this Honorable Court to take notice of the above and grant the brief extension of time above referenced.

**RESPECTFULLY SUBMITTED**, in San Juan, Puerto Rico, on April 11, 2022, date on which I hereby CERTIFY that I have electronically filed the foregoing document with the Clerk of the Court via the CM/ECF system which shall send automatic notification of such filing to all counsel for the parties of record.

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LAW OFFICES OF SAMUEL KORNHAUSER

And

LAW OFFICES OF BRIAN DAVID

And

BAELLA & BAELLA

Attorneys for Plaintiffs and  
those similarly situated

By: /s/ Rafael Baella-Silva

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